

April 17, 2007

**Ex Parte – Via Electronic Submission**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 03-15

Dear Ms. Dortch:

On April 13, 2007, representatives of the Coalition for Independent Ratings Services ("Coalition") met with Commission staff to discuss the status of Section 15.120(d)(2) of the Commission Rules relative to open V-chip requirements. Dominic Perri, Director, Public Affairs for Media Data Corporation and Patricia Paoletta met with Mary Beth Murphy, Chief, Media Bureau Policy Division, Eloise Gore, Assistant Chief, Media Bureau Policy Division, Mike Lance, Deputy Chief, Engineering Division Media Bureau, and Kim Matthews, Media Bureau in connection with the above-noted docket.

Issues discussed included:

1) The Commission's requirement that as of March 16, 2006, under Section 15.120(d)(2)'s open V-chip requirement, DTV receivers must be capable of downloading new rating systems "out-of-the-box". The Coalition reported on its investigation into DTV receiver compliance with respect to the year-old open V-chip requirement for DTV and the Coalition's efforts to engage a private firm to perform compliance tests. The Coalition's ongoing compliance investigation indicates that CE DTV set manufacturers are not following CEA-CEB-12-A PSIP Recommended Practice as it relates to receiver action in response to broadcast RRTs and content advisories.

Ms. Marlene Dortch  
April 17, 2007  
Page 2

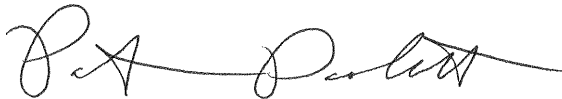
The Coalition inquired whether the FCC could perform needed tests. The Coalition's further investigations are continuing.

2) The Coalition discussed the Consumer Electronics Association's (CEA) standard CEA 766-B on U.S. and Canadian Rating Region Tables (RRT) and Content Advisory Descriptors for Transport of Content Advisory Information Using ATSC Program and System Information Protocol (PSIP). The Coalition reported on its participation in the American National Standards Institute's (ANSI) public review of the CEA-766-B US/CDN RRT/CAD PSIP transport standard and its concern that the version of CEA-766-B that emerged from the review is unclear and potentially misleading to manufacturers. Mr. Perri noted that he offered language during the review in order to accommodate additional Rating Region Tables (RRTs) in the future or otherwise be capable of defining additional rating systems. He also raised the Coalition's concerns about whether CEA-766-B fully addresses the Commission's rules which require receivers to respond to "changes in the content advisory system" (emphasis added).

3) The Coalition also reported on its investigation into licensing fees and indicated that it found no evidence of any undue technical or economic burden on those consumer electronics manufacturers who are implementing the new Section 15.120(d)(2) open V-chip requirements.

In accordance with Sections 1.49(f) and 1.1206(b) of the Commission's Rules, this letter is being filed electronically in the above docket.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patricia Paoletta', with a stylized flourish at the end.

Patricia Paoletta  
*Counsel to the Coalition for Independent Ratings Services*

cc: Mary Beth Murphy  
Eloise Gore  
Alan Stillwell  
Mike Lance  
Kim Matthews